

## **REMARKS**

Claims 1, 11, 17 and 23 have been amended. Claim 16 was previously canceled. Claims 1-15 and 17-25 remain pending in the application. Reconsideration is respectfully requested in light of the following remarks.

### **Section 103(a) Rejection:**

The Office Action rejected claims 1-25 under 35 U.S.C. § 103(a) as being unpatentable over Rivera et al. (U.S. Publication 2002/0107699) (hereinafter “Rivera”). Applicants respectfully traverse this rejection for at least the following reasons.

**In regard to claim 1, Rivera does not teach or suggest a content mapping module configured to map the tags of a first data format to tags of a second data format to determine data objects and attributes in a database corresponding to content in the second format.** As discussed in Applicants’ disclosure, the content mapping module may be configured with customizable tag mapping to support translation of incoming documents in multiple different formats to an internal format and to correspond tags of the incoming documents to data objects and attributes in the database. Rivera does not teach or suggest mapping module configured to map the tags of a first data format to tags of a second data format to determine data objects and attributes in a database corresponding to content in the second format.

Nor would this limitation have been obvious to one of ordinary skill in the art at the time of Applicants’ invention. Obviousness can only be established by combining or modifying the teachings of the prior art to produce the claimed invention where there is some teaching, suggestion, or motivation to do so in the prior art. *In re Fine*, 837 F.2d 1071 (Fed. Cir. 1988). The question is whether there is something in the prior art as a whole to suggest the desirability, and thus the obviousness, of making the combination. *Lindemann Maschinenfabrik GmbH v. American Hoist & Derrick Co.*, 221 USPQ 481, 488 (Fed. Cir. 1984). “The factual inquiry whether to combine references must be

thorough and searching.” *McGinley v. Franklin Sports, Inc.*, 60 USPQ2d 1001, 1008 (Fed. Cir. 2001). It must be based on objective evidence of record. “This precedent has been reinforced in myriad decisions, and cannot be dispensed with.” *In re Sang Su Lee*, 61 USPQ2d 1430 (Fed. Cir. 2002). “The need for specificity pervades this authority.” *Id.* “Particular findings must be made as to the reason the skilled artisan, with no knowledge of the claimed invention, would have selected these components for combination in the manner claimed.” *In re Kotzab*, 55 USPQ2d 1313, 1317 (Fed. Cir. 2000). The Examiner’s statements in the Final Action regarding the use of tags are not supported by any evidence of record and are therefore improper. Moreover, the Examiner’s statements regarding the use of tags are not commensurate with the limitations recited in claim 1.

Further in regard to claim 1, Rivera does not teach or suggest applications content translation logic for dynamically presenting translated applications content in a third format by selectively retrieving one or more of said corresponding data objects and attributes according to a flag, wherein the flag indicates whether or not a corresponding data object or attribute is to be presented in the third format. The use of flags allows for selective and customizable control of translation to the third format for outbound documents. Rivera does not teach or suggest the use of flags to control what data objects or attributes are presented in a third format. Nor would this limitation have been obvious to one of ordinary skill in the art at the time of Applicants’ invention.

Independent claims 11, 17 and 23 are distinguishable over the cited art for reasons similar to those discussed above in regard to claim 1. Applicants also assert that numerous ones of the dependent claims recite further distinctions over the cited art. However, since the independent claims have been shown to be patentably distinct, a further discussion of the dependent claims is not necessary at this time.

## CONCLUSION

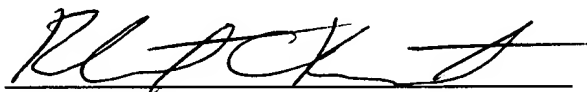
Applicants submit the application is in condition for allowance, and notice to that effect is respectfully requested.

If any fees are due, the Commissioner is authorized to charge said fees to Meyertons, Hood, Kivlin, Kowert, & Goetzel, P.C. Deposit Account No. 501505/5681-90100/RCK.

Also enclosed herewith are the following items:

- ☒ Return Receipt Postcard
- ☐ Petition for Extension of Time
- ☐ Notice of Change of Address
- ☐ Fee Authorization Form authorizing a deposit account debit in the amount of \$  
for fees (        ).
- ☐ Other:

Respectfully submitted,



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